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MEMO ENDORSED

April 1, 2021

BY ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 24A
New York, New York 10007

Re: Marina Brown v. New York City, et al.
Civil Action No.: 20-cv-10948 (CM)

Dear Judge McMahon:

I am the Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assigned to represent defendants City of New York ("City") and the New York City Department of Education ("DOE") (collectively, "Defendants") in the above-referenced action. I write to respectfully request a two-week extension of time, from April 5, 2021 to April 19, 2021, for Defendants to respond to the complaint. Defendants previously requested, and the Court granted, an extension of time from January 28, 2021 to March 15, 2021, and from March 15, 2021 to April 5, 2021. There are no other dates previously scheduled after the original date.

The undersigned attempted to reach Plaintiff's counsel via email and telephone on April 1, 2021, but did not receive a response to whether he would consent to this application. This additional extension request is made due to the undersigned's very heavy caseload, which over the next two weeks includes appearing for a hearing before the New York State Division of Human Rights commencing on April 5th and preparing responses to three complaints in addition to the instant complaint. The foregoing obligations necessitate additional time to prepare and finalize Defendants' response.

cc: Ethan Leonard, Esq. (by ECF)
The Law Offices of Neal Brickman, PC
Attorneys for Plaintiff

Thank you for your consideration of this matter.

Respectfully Submitted,

/s/

Laura C. Williams
Assistant Corporation Counsel